

**North American Numbering Council
Meeting Minutes
September 25, 2003 (Final)**

I. Time and Place of Meeting. The North American Numbering Council held a meeting commencing at 9:00 a.m., at the Federal Communications Commission, 445 12th Street, S.W., TW-C305, Washington, D. C.

II. List of Attendees.

Voting Council Members:

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| 1. Robert Atkinson | Chairman |
| 2. Paul LaGattuta | AT&T |
| 3. Doug Birdwise | Bell Canada |
| 4. Randy Sanders | BellSouth |
| 5. Lori Messing | CTIA |
| 6. H. Russell Frisby, Jr. | CompTel |
| 7. Karen Mulberry | MCI |
| 8. Hon. Loretta Lynch | NARUC – California |
| 9. Hon. Elliott Smith | NARUC – Iowa |
| 10. Dan Kearney | NARUC – Michigan |
| 11. Hon. Nancy Brockway | NARUC – New Hampshire |
| 12. Christine Sealock Kelly | NARUC – New York |
| 13. Beth O'Donnell | NCTA |
| 14. Christopher Bowe | Nextel |
| 15. David Bench | Nortel Networks |
| 16. John McHugh | OPASTCO |
| 17. C. Courtney Jackson | OUR |
| 18. Mark Welch | SBC Communications, Inc. |
| 19. Hoke Knox | Sprint |
| 20. Anna Miller | T-Mobile USA, Inc. |
| 21. Thomas Soroka, Jr. | USTA |
| 22. Michael O'Connor | Verizon |

Special Members (Non-voting):

- | | |
|-----------------|-------|
| John Manning | NANPA |
| Jean-Paul Emard | ATIS |
| Steven Delaney | CRTC |
| Amy Putnam | PA |

Commission Employees:

- Sanford Williams, Designated Federal Officer (DFO)
Pam Slipakoff, Alternate DFO

Deborah Blue, Special Assistant to the DFO
Cheryl Callahan, Assistant Chief, Telecommunications Access Policy Division

III. Estimate of Public Attendance. Approximately 32 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) Number Exhaust Solutions Report from Summer Sleuths
- (3) NANPA Fund Performance Status Report & Funds Projection
- (4) Issue Management Group Report on Abbreviated Dialing for One Call Notification
- (5) Issue Management Group Report and Recommendation on Abbreviated Dialing for One Call Notification
- (6) National Thousands Block Number Pooling Services Report
- (7) INC Report to the NANC
- (8) Contribution from Nortel Networks Regarding Multiple LRNs
- (9) LNPA Working Group Status Report to the NANC
- (10) Wireless Number Portability Operations Status Report to the NANC
- (11) NANPA Report to the NANC
- (12) Status of Area Code Relief Exhausting within 36 Months
- (13) Numbering Oversight Working Group (NOWG) Report
- (14) Numbering Oversight Working Group Pooling Administration Proposal Change Order #24
- (15) Status of ENUM Implementation in the U.S.
- (16) List of NANC Accomplishments (January 2002 – Present)
- (17) May 13, 2003 NANC Meeting Minutes
- (18) July 15, 2003 NANC Meeting Minutes

V. Summary of the Meeting.

Announcements and Recent News. Chairman Atkinson announced the following NANC appointments: Pamela Connell as the primary member for AT&T; Paul LaGattuta as the alternate for AT&T; Karen Mulberry as the primary member for MCI; and Henry Hultquist as the alternate for MCI. Sanford Williams, Designated Federal Officer (DFO), announced that on August 11, 2003, the FCC released an Order (FCC 03-196) which granted, in part, the California Public Utilities Commission's (CPUC) request to raise the Contamination Level in the 310 and 909 Area Codes.

A. Approval of Meeting Minutes. The May 13, 2003 and July 15, 2003 NANC Meeting Minutes will be approved by e-mail in order to provide sufficient time for review by the Council Members.

B. Report from Summer Sleuths Regarding Number Exhaust Solutions. Barry Bishop, NeuStar, explained that the Summer Sleuths Program is a science and math

program in which students are taught through a Problem-Based Learning method. The students are presented with a problem, given resources and expert help, and tasked with proposing solutions. He indicated that this summer, the students worked in groups on number exhaust. Deb Gerdes, Professional Development Leader for Problem-Based Learning, Illinois Mathematics and Science Academy, Aurora, IL, gave an Overview of the Summer Sleuths Program. Andy Jones, 7th grade Summer Sleuths student, Hauser Junior High, Riverside, IL, gave an overview of one group's solution that would add extra digits to the numbering plan and would be color coded. Erik Binter, 6th grade Summer Sleuths student, Whittier Elementary School, Downers Grove, IL, gave an overview of another group's solution that would expand the area that each central office can serve, so that telephone numbers allocated to each central office can be used more efficiently. Rita Bergeron, math teacher and Summer Sleuths coach, Marmion Academy, Aurora, IL, gave an overview of solutions from other student groups.

Chairman Atkinson thanked the teachers and the students on behalf of the NANC for sharing the solutions with the NANC. He also expressed appreciation on behalf of the NANC to NeuStar for allowing Barry Bishop and Ron Connors to help with the project.

C. North American Billing and Collection (NBANC) Report. John Ricker, NBANC, presented the report to the Council. Mr. Ricker reported that as of August 31, 2003, the current fund balance is \$12.6 Million. He advised that \$7.2 Million is attributable to current obligations for the 2003-2004 funding year. NBANC anticipates receiving an additional \$4 Million for the 2003-2004 funding year from monthly contributors, leaving \$16.6 Million available at the end of the year. Mr. Ricker advised that obligations against the \$16.6 Million for payments to NeuStar for the NANPA functions (Thousands-Block Pooling Administration, carrier audits, NRUF, and the Billing and Collection Agent) are going to be approximately half of that amount. Mr. Ricker noted that the year-end balance will be a little over \$8 Million. He stated that NBANC's Board of Directors directed NBANC to make a supplemental filing with the FCC that will lower the contribution factor for this year from 0.000036 to 0.000021, and refund approximately \$3 Million to the industry. The Board further directed NBANC to use the remaining surplus to attempt to maintain a contribution factor of 0.000021 for next two years.

D. North American Portability Management (NAPM) LLC Report. Richard Theiss, Verizon, presented the report to the Council. Mr. Theiss stated that the NAPM LLC has been working with NeuStar to assess the expected volume increases from wireless local number portability (LNP) starting in November 2003 through 2004. He advised that the NAPM LLC has a subcommittee that is working with NeuStar concerning the volume impacts on its master contracts. Mr. Theiss further advised that at the November 5, 2003 NANC meeting, the NAPM LLC should have a little more detail regarding what it has been working on and what the expectations are in the coming year for the volume increases in wireless LNP.

Mr. Theiss noted that in the past month, the NAPM LLC added a new member company - AT&T Wireless. The membership consists of AT&T Wireless, AT&T, BellSouth, Citizens, Cox Communications, ICG, MCI, Qwest, SBC, Verizon, and Sprint.

E. Report of the 3-Digit DIG IMG. James Castagna, Verizon, presented the report to the Council. Mr. Castagna stated that The Pipeline Safety Improvement Act (Public Law 107-355) mandates the establishment of a 3-digit nationwide toll-free telephone number system for use by State One Call notification systems. He indicated that based on NANC discussions at its January 22, 2003 meeting, the Abbreviated Dialing for One Call Notification IMG (IMG) was formed to examine issues related to implementation of this mandate. Mr. Castagna advised that the IMG produced a set of assumptions. Some of the assumptions were identified in the mandate and some were identified by IMG members to help direct the activities of the IMG:

- The 3-digit customer-dialed access code selected for implementation will translate to a toll-free number or local number for an existing One Call Center.
- On wireline originated calls, the originating NPA-NXX or originating switch location will determine the One Call Center to which the call is sent. For wireless originated calls, the originating Mobile Switching Center will determine the One Call Center to which the call is sent.
- To be “toll-free,” the One Call Center destination telephone number used by switch receiving calls with a 3-digit access code needs to be either a local, non-intraLATA toll or an 8YY Services number.
- As with existing N11 access codes, customers calling the new 3-digit code will be charged the same as a local (non-toll a.k.a. toll-free) call.
- The customer-dialed 3-digit access code will ultimately be the same for all callers.
- Implementation will be national in scope and uniformity of the 3-digit access code will be available to all state One Call Centers. All telecommunications carriers will be responsible to route, or make arrangements to have another carrier route, calls to the appropriate One Call Center.
- Operator (e.g., 0+) and Carrier Access Code (10XXX+ and 1-1XXX+) dialing patterns will generally not be supported.

Nancy Brockway, NARUC, New Hampshire, commented that the establishment of a 3-digit nationwide toll-free telephone number system seems like an appallingly bad idea. She presumed that since the Pipeline Safety Improvement Act is statutory, the NANC has no choice in the matter. Chairman Atkinson informed that the statute requires the Department of Transportation (DOT), with the FCC’s advice, do something within one year of its passage. He indicated that the deadline is December 17, 2003. Ms. Brockway recommended that the NANC draft a letter to Congress opposing this mandate. She stated that Dig Safe has been employed in New Hampshire and has been branded for years. Ms. Brockway pointed out that New Hampshire has put a lot of energy and investment into branding Dig Safe, and that N11 should be reserved for emergency-type

circumstances. Ms. Brockway opined that it is a move backwards in terms of Pipeline Safety.

Mr. Castagna stated that the IMG identified three alternatives that it thought required further evaluation:

1. Vertical Service-like Code: #344, *344, 344#.
2. Geographic NPA/Easily Recognizable Code ERC 344.
3. N11 Special Access Code: 811 – one of the two remaining N11 codes not reserved or in widespread use.

Mr. Castagna reviewed the Analysis of the Alternatives with the Council:

Alternative #1 – Use of # or * with 344:

- Wireline implementation using # or * would require extensive switch development or replacement with significant cost and delay.
- PBX & rotary phones would prevent ubiquitous availability.

Alternative #2 – ERC 344:

- Some switch types cannot support 344 without development or replacement.
- Inter-digit timeout required in 7-digit dialing areas where 344 is an NXX
 - Calls to One Call Centers delayed
 - Slow-dialed calls to 344-XXXX misrouted to One Call Center.
- Loss of a potential NPA (8 million TNs).
- Undesirable precedent for use of abbreviated dialing.

Alternative #3 – N11 Code 811

- Wireline IMG members feel 811 is easier to implement – no switch development.
- N11 follows current wireline abbreviated dialing pattern.
- Uses one of the last two N11 codes.
- National Emergency Number Association concerns about misdialing and availability of 811 as a 911 test code.
- National Telecommunications Damage Prevention Council concerned about effort invested in #344 for wireless.

Mr. Castagna stated that the IMG made the following recommendations:

- Both wireless and wireline should implement 811.
- Wireless retains #344 as well, either indefinitely or for some transition period.
- Absent the statutory requirement for a three-digit code, a single ten-digit, toll-free, mnemonic number may have been selected.
- Achieving the essential objective of any future mandate should not preclude the consideration of all numbering alternatives.

Chairman Atkinson inquired as to the nature of the discussion among IMG members re the statement in the IMG Report and Recommendation: “Absent the statutory requirement for a three-digit code, many of the IMG members would have recommended use of a single ten-digit toll-free number to implement uniform access to individual State One Call Centers.” He questioned whether, in the absence of the statutory requirement, this would have been the preferred recommendation.

Mr. Castagna stated that from a resource perspective, if there was not a statutory requirement, the IMG would have pursued an analysis of implementing an 800-based service nationwide for this type of application to determine if it was a wiser choice. He indicated that since the mandate specified a three-digit number, the IMG did not pursue an 800-based service.

Mr. Castagna stated that he will submit a revised version of the IMG handout on Abbreviated Dialing for One Call Notification. It will summarize the third bullet which reads: “absent the statutory requirement for a three-digit code, a single ten-digit, toll-free, mnemonic number may have been selected.”

Paul LaGattuta, AT&T, stated that AT&T would have preferred to use 344 as the code. He reported that after discussion with AT&T National Telecommunications Damage Prevention Council (NTDPC) and Network Reliability and Interoperability Council (NRIC) representatives, AT&T has come to the conclusion that the industry would be better served by implementing 344 rather than 811 as the abbreviated dialing code for One Call Notification. This is both because of the wireless implementation of #344 and the attendant contractor education that has already taken place, and because of the mnemonic value 344 (D-I-G on the telephone keypad) will have for the public. AT&T recognizes that not all carriers will be able to implement 344 immediately and expects the eventual rules will allow for a phased-in deployment to protect carriers whose switches cannot accommodate 344 as detailed in the IMG’s report.

Elliott Smith, NARUC, Iowa, remarked that he echoes the same concerns expressed by Ms. Brockway. He indicated that the Iowa Utilities Board considered submitting a letter and then decided not to for many of the same reasons expressed by Ms. Brockway. Mr. Smith questioned whether 211 could be a viable alternative. Mr. Castagna stated that the IMG did not look into that option. He stated that the IMG did not consider placing the application onto an existing N11 service. Mr. Castagna stated that during the discussions, the IMG focused on N11 as an alternative. Mr. Castagna advised that the IMG decided that 811 would be the least resistant route. He further advised that the recommendation for 811 is more specific to the IMG’s general recommendation for an N11 code. Mr. Smith agreed with Ms. Brockway’s recommendation that a communication be made to the appropriate people on the Hill as to some other alternatives that could be considered in this instance.

Chairman Atkinson inquired as to what the DOT is doing since the law places the onus on them. Mr. Williams stated that on or about August 28, 2003, the DOT filed a Petition

with the FCC requesting the establishment of a three-digit number pursuant to the Act. He noted that in its petition, the DOT favored 344 as the number that would be used. Mr. Williams advised that the FCC expects to release an NPRM seeking comment on the petition and options for an abbreviated dialing code pursuant to the Pipeline Safety Act. Chairman Atkinson stated that December 17, 2003, which is the one-year date of enactment of the Act, is near. Mr. Williams stated that he can not ensure that the NPRM will be released by December 17, but he indicated that the item is being actively worked.

Cheryl Callahan, Assistant Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, clarified that the FCC received a Petition from the DOT and is working on an NPRM. She pointed out that it is unclear what has to happen by December 17, 2003, but the Bureau hopes the Commission will be able to release the NPRM by December 17 in order to satisfy the requirements of the Act. Ms. Callahan stated the NPRM is on a relatively fast track, but implementation issues are going to be on a longer track. Chairman Atkinson stated that the NANC's responsibility is to advise the FCC on number conservation, number implementation, etc. He noted that it is very relevant to the NANC's Charter that the two solutions suggested, thus far, are to use one of the last N11 codes or to use 8 million numbers. Chairman Atkinson remarked that it sounds pretty serious. He agreed with Ms. Brockway's suggestion that the NANC needs to think about this. He expressed concern that the NANC is forced to pick from the best of two bad alternatives. Chairman Atkinson further stated that it would make more sense, and that regulators could arrive at a workable solution quicker and cheaper, if there was a little more flexibility in the statute instead of just three digits.

After extensive discussion, Chairman Atkinson proposed drafting a cover letter transmitting the IMG report to the FCC. The title on the IMG report will be changed from recommendation to status report. Mr. LaGatutta will provide a statement from AT&T as an attachment. The letter will be in the context of providing the FCC with information about the complexities of all of the solutions and indicate that there is no NANC consensus on the recommendations. The letter will be circulated to the NANC members for editing. He stated that the letter may help the FCC with formulating its NPRM.

Loretta Lynch, NARUC, California, pointed out that the IMG did not look at alternate N11 numbers as an option, nor did it look at the impact on the exhaust of the NANP as an effect or consequence. She stated that forwarding the IMG report as a status report that contains a recommendation without fully flushing out that the options looked at were limited is a misnomer to the FCC about what the scope of this endeavor was.

Mr. Bench stated that the IMG did a remarkable job. He further stated that the IMG's work was based on the statute. He indicated that it attempted no social engineering or no re-engineering of existing functionalities.

After further discussion, it was decided that the transmittal letter and IMG Report will not be sent to the FCC at this time. NARUC will get feedback from the state commissions on the potential impact to existing state procedures. The Dig-IMG will continue evaluating

the 3-Digit options: sharing 211, 311, and 511; the impact of 344 on numbering plan; possible confusion between the misdialing of 811 and 911; whether or not 911 is set up to perform these functions; and any other issues.

Chairman Atkinson stated that the FCC has heard a lot and have the documents as they now stand. He stated that the FCC should make it clear to the DOT and everybody else that this is not going to be an easy solution. Chairman Atkinson stated that the Dig-IMG Report was very good and informative.

Mr. Welch remarked that the concept of a funding mechanism for implementing this should not be forgotten. He advised that it was not discussed a lot, and indicated that he would not expect the IMG to do it. Mr. Welch expressed hope that it will be part of the NPRM.

Ms. Brockway expressed appreciation to the IMG for all of the work that went into the report.

F. Presentation by National Thousands-Block Pooling Administrator (PA).

Amy Putnam, NeuStar, provided the report to the Council. Ms. Putnam stated that since the implementation of the national rollout began on January 4, 2002, there have been 108 First Implementation Meetings (FIMs) for 161 NPAs (including overlays and splits in permissive dialing). The last FIM was held on July 30, 2003. All NPAs in the national rollout schedule will be available to be implemented by December 12, 2003.

Ms. Putnam stated that on June 19, 2003, the FCC issued the Fourth Report and Order in CC Docket 99-200 and CC Docket 95-166 (NRO 4). The Order was effective on August 20, 2003. Ms. Putnam reported that the PA has updated the mandatory, optional or excluded status of rate centers within all pooling NPAs to conform to NRO 4. These files include a list of definitions associated with each Rate Center File that explains their designations.

Ms. Putnam reported that Change Order #24 was filed with the FCC on August 26, 2003. It replaces Change Order #23 which is withdrawn.

Ms. Putnam reported that Change Orders which are resolved but not yet implemented will be rolled out in two phases. Phase 1 will be available to PAS users effective November 21, 2003 for the following Change Orders:

- Change Order #12 LNPA Issue #343 – Changes to TBPAG from FCC 01-362 (INC Issue 343)
- Change Order #14 LNPA Issue #360 – Modify the Part 3 form in the TBPAG (INC Issue 360)
- Change Order #18 Removal of the AOCN field from the Part 1A Form (INC Issue 385)
- Change Order #21 Part 1A Report.

Phase 2 will be available to PAS users effective February 23, 2004 for the following Change Orders:

- Change Order #13 LNPA Issue #356 – Modification to the User Profile Applications Appendix 5 form (INC Issue 356)
- Change Order #18 Removal of the AOCN field from the Part 1A Form (INC Issue 385) (FTP Modification Only)
- Change Order #20 LNPA issue #387 – Changing Non-Pooled NXXs to Pooled NXXs (INC Issue 387)
- Change Order #22 LNPA Issue #335 – AOCNs Performing Initial Thousands-Block Entries into BIRRDs and LNPA Issue #414 – Revisit Minimum Expedite Effective Date for a Thousands-Block (INC Issues 335 and Issue 414).

Ms. Putnam reported that for July 2003 Report, 2,567 applications were approved; 351 applications were denied; and 160 applications were suspended. She further reported that network availability was 99.9 percent. There was a temporary login problem for 29 minutes during the month of June 2003. For the August 2003 Report, 3,473 applications were approved; 357 applications were denied; and 242 applications were suspended. Network availability was 100 percent. For the September 2003 Report, 3,247 applications were approved; 307 applications were denied; and 135 applications were suspended. Network availability was 100 percent.

Mr. Smith requested that the PA provide a list of the pooling acronyms with definitions spelled out. Ms. Putnam agreed to provide a list.

G. Industry Numbering Committee (INC) Report. Dana Smith, INC Moderator, presented the report to the Council. Ms. Smith reviewed the INC meeting schedule with the Council members. She stated that the INC Voice over Internet Protocol (VoIP) Workshop identified and discussed many different aspects of Public Switched Telephone Network (PSTN) numbering assumptions and assignment practices with respect to VoIP technology. Ms. Smith advised that it became evident that the widely disparate opinions would best be captured on a simple chart, with no conclusions being drawn. She indicated that the INC determined that there is no need to change INC guidelines until such time as regulatory decisions may provide direction, or if INC is requested by some entity such as the NANC to recommend such changes.

Multiple LRNs

Ms. Smith stated that in response to the NANC action item it received at the July 2003 NANC meeting, the INC met with the LNPA Working Group and NANPA, taking into consideration the concerns of state regulators on the Multiple Location Routing Numbers (LRN) Issue. She advised that the INC identified three situations that may warrant additional LRNs:

- When there are multiple tandems owned by different service providers (SPs) in a single LATA, the requesting SP may obtain a new NXX in order to establish an LRN for each subtending point of interconnection (POI).
- Regulatory waivers granted to ILECs to carry local calls across a LATA boundary may exist. In such instances, SPs may be justified in establishing an additional LRN to properly route calls.
- A Unique LRN is required for each NPAC region within a single LATA when a single switch serves multiple NPAC regions.

Ms. Smith stated that the PA receives industry direction from the “Thousands-Block Pooling Administration Guidelines,” while SPs receive guidance for selecting LRNs from the “Location Routing Number Assignment Practices.” She advised that the issue is now in initial closure.

Ms. Lynch inquired as to how this issue can be in initial closure without the results of the survey. Ms. Smith pointed that it is in initial closure rather than final closure. She explained that initial closure still allows for additional input from any SP, the NANPA, or the PA to the INC. Ms. Smith further explained that the INC can consider the results of the survey if changes need to be made. Ms. Lynch questioned whether any state has asked to contribute to the report. Ms. Smith stated that the State Coordination Group did provide a contribution to the INC at the July 2003 INC meeting. She further stated that some state representatives have participated in some of the INC’s interim conference calls as well. Ms. Lynch commented that until the results of the surveys and contributions from the states are in, it is premature to put this issue into initial closure.

Christine Sealock Kelly, NARUC, New York, stated that she participated in at least one INC conference call and coordinated the submission from the State Coordination Group in July 2003. She indicated that it is her understanding that the INC was proposing to incorporate into a set of guidelines, some parameters/ideas that SPs should consider before requesting additional LRNs. Ms. Kelly stated that there was real concern that the INC will not be looking at inter-tandem trunking, which was very successful in New York. She indicated that it was perceived as a tradeoff between costs to the industry to utilize inter-tandem trunking and exhausting the NANP. Ms. Kelly suggested that someone either at the INC level or the NANC level should look at utilizing inter-tandem trunking.

Ms. Smith stated that the INC also added some text to the Thousands-Block Pooling Guidelines and the LRN Assignment Practices that provides some input to SPs pointing out some things that can be looked at before requesting an NXX.

Mr. Bench noted that the multiple LRN issue is another symptom of the lack of uniform interconnection, interoperability and architectures across the various industry participants in the PSTN. In other words, the topography of the PSTN is not homogenous. Allowing multiple LRNs should not relieve a service provider from developing bi-lateral agreements between themselves and interconnecting service providers.

According to Mr. Bench, assignment of multiple LRNs is a quick fix to a problem that is complicated by the following:

- Network architecture differences
- Political jurisdictions of call origination/call termination
- Regulatory jurisdiction of the call routed via an LRN (Local, Toll (Intra, Inter))
- Costs of data base records
- Charges for NPAC queries
- Which company does the NPAC query
- Misuse of LRNs
- Misrouting of LRNs

He pointed out that assignment of multiple LRNs is allowed under ANSI T1 TRQ-02 by the statement that bi-lateral agreements, between service providers, take precedent over the standard. The NIIF Inter-connection Template states that bilateral agreements, between service providers, take precedent over the template. Mr. Bench stated that the problem is amplified by the differences in regulatory rules and standards across the various segments that utilize NANP resources, e.g., the FCC separates wireline and wireless carriers into two separate bureaus when in reality, wireless carriers are only wireless in their connection of the subscriber instrument to the PSTN.

Anna Miller, T-Mobile USA, Inc., clarified that at the last INC meeting, the focus was the technical issues associated with multiple LRNs. She stated that there is a checklist in the INC Guidelines which encourages number conservation practices so that carriers are aware of the options they have in order to use existing resources for LRN assignments. Ms. Miller further stated that if a carrier had to get another NXX, they could donate blocks because of the pooling environment. She indicated that one option would be to do inter-tandem trunking. Ms. Miller inquired whether inter-tandem trunking is included in the checklist. Ms. Smith responded no.

Mr. Welch advised that incumbent local exchange carriers should not be put in a position of trying to determine whether or not a call originates and terminates in a boundary that crosses a LATA. He stated that while the first issue might have a different alternative, the other two issues are technical issues that have regulatory implications.

Further discussion on the LRN Issue was delayed until the end of the INC Report.

Grandfathered NXXs

Ms. Smith reported that the INC has two issues on wireless grandfathered codes and posed the following two questions to the NANC:

- 1) Should the telephone numbers (TNs) within these codes be exempt from porting?
- 2) Since the California Commission allows the wireless SPs who agree to make no further TN assignments from grandfathered NXXs to exempt the NXXs from the utilization calculation when the wireless SP applies for growth resources, does the

California decision override the FCC rule on criteria for obtaining additional resources?

With respect to exempting TNs in grandfathered codes from porting, Lori Messing, CTIA, stated that to the extent that this issue is with the FCC and is in the advocacy phase, the NANC should not issue a recommendation. She further stated that carriers should submit their own comments to the FCC.

Ms. Lynch stated that she supports CTIA's perspective. She advised that it is a policy issue, not a technical issue. Ms. Lynch stated that she does not know why the INC is bringing this issue to the NANC.

Mr. Welch expressed confusion. He advised that the INC handles the technical issues, and the NANC handles the policy issues and makes policy recommendations to the FCC even while there are pending proceedings. Mr. Welch stated that from his perspective although there is pending dialogue going at the FCC, that should not keep the NANC from being able to give the FCC policy insight. He opined that there is no way that the NANC is going to reach a consensus on this issue. Mr. Welch stated that the NANC's purpose is to address the policy issues, but he is okay with not addressing this issue.

Ms. Mulberry agreed with Ms. Messing and Ms. Lynch. She stated that the rules for portability have not changed. Ms. Mulberry further stated that if the numbers fall within the criteria to be ported, unless the FCC issues a regulatory directive to change it, there are no exemptions for it.

Mr. Knox stated that Sprint supports portability of grandfathered codes but would like to see it be done voluntarily. He further stated that if a carrier technically cannot handle grandfathered codes, they should be allowed not to have to port those numbers. Mr. Knox advised that there are some technical issues involved.

Ms. Miller agreed with Mr. Welch that given that this is an open docket, the NANC should agree to disagree on the policy side and wait and see what kind of comments are received on the petition. She indicated that T-Mobile is not aware of any rules that would allow it to deny a customer's request to port their number because they happened to be assigned a grandfathered number as opposed to another number. Ms. Miller questioned whether any technical issues have been brought forth for the INC to address.

Chairman Atkinson questioned whether the INC is asking for feedback from the NANC or if it is seeking the response from the FCC on the USTA petition. Ms. Smith responded that it is the latter. Chairman Atkinson advised that the INC should take that issue before the FCC, and recommended that the NANC pass on it.

Thomas Soroka, USTA, stated that the USTA's petition contains both policy and technical related issues. He recommended that if the FCC allows porting with grandfathered numbers, that the NANC ask the INC to look at the technical issues that the USTA raised in its petition.

Ms. Mulberry disagreed. She stated that the INC can choose to do whatever it wants when a regulatory order is issued. Ms. Mulberry advised the INC does not need any direction from the NANC to do that. She stated that under the current regulatory directives that exist for LNP, there is a waiver process. Ms. Mulberry further stated that if any individual provider is not capable of porting, it can apply for an exemption. She pointed out that it is an individual choice and not a national/technical issue. It is supposed to be an equal national operational process and not a unique exemption for everybody.

Mr. Knox remarked that when the technical issue is looked at, it is going to be drawn between the two different industries. He stated that wireline is going to have a problem, and wireless is not. Mr. Knox indicated Sprint is facing that issue right now. He stated that Sprint cannot come to an internal consensus.

Mr. Welch clarified that some carriers do not have the opportunity to volunteer or not volunteer on their own networks. He indicated that some carriers have the opportunity to do what competing carriers want them to do on their networks. Mr. Welch emphasized that SBC does not always get to make the decisions on what is done on its network. Mr. Welch indicated that even if the FCC makes a determination, SBC may find itself going back and seeking additional clarification from a state that might have decided something different.

After extensive discussion, Chairman Atkinson proposed that the NANC let the FCC act on the pending petition. The NANC will continue to monitor the issue.

Ms. Lynch stated that there are policy issues, technical issues, and legal issues involved with the CPUC treatment of grandfathered codes in carriers' utilization calculation. She stated that it is inappropriate for the NANC to address this issue given the authority that has been delegated to state commissions such as California. Ms. Lynch pointed out that there is an active proceeding as well at the FCC, and anyone should direct comments to the FCC rather than the NANC.

Ms. Miller stated that this was one of the issues that T-Mobile brought to the INC. She stated that the motivation behind the contribution was to facilitate the elimination of customers with grandfathered codes. She explained that SPs did not want it to impact its ability to maintain numbering inventory for its customers. Ms. Miller indicated that there were three alternatives that were looked at in the California docket: 1) taking back the customer's telephone number; 2) where possible, to re-home the NXX to the home NPA; and 3) through attrition. She indicated that most carriers favored attrition, trying to reduce the number of grandfathered codes as customers disconnect or change service providers, etc. Ms. Miller explained that the contribution facilitates that process. She further explained that T-Mobile is trying to support attrition and minimize the impact on the customers. Ms. Miller further advised that T-Mobile submitted the contribution to allow the exemption so that the code could be protected from further assignment. She pointed out that once the contamination level reached 10% or 25% in 310 and 909,

grandfathered codes could be donated back and eventually be re-used and minimize the impact on customers.

Chairman Atkinson questioned whether the question is misstated. He further questioned whether there is a policy issue involved.

Ms. Mulberry questioned whether in reviewing this issue at the INC, if there was any consideration given as to the effect on other states that have grandfathered codes. She further questioned whether the INC is asking for all states to operate in a certain manner in order to be exempt from the process.

Ms. Smith stated that it is her understanding that T-Mobile brought the issue to the INC because they liked California's decision. Ms. Mulberry inquired whether T-Mobile was trying to put it in the guidelines so that everyone would follow the same process. Ms. Smith responded that she assumed so.

Ms. Miller commented that, essentially, California is the only state with an Order. She pointed out that New York has a waiver process that is being used by carriers to facilitate elimination of customers with grandfathered numbers. Ms. Miller commented that maybe T-Mobile was trying to be too pro-active in its contribution. She stated that, perhaps, T-Mobile should wait until there is a problem.

Ms. Smith reviewed the INC issue Summary for Active Workshops with the Council Members.

Multiple LRNs continued

Mr. Manning reported that at the July 2003 NANC meeting, an issue involving the potential for assigning multiple Location Routing Numbers (LRNs) to a switch or point of interconnection (POI) was discussed. He stated that concern was expressed that such assignments may impact central office code demand and NPA exhaust. Mr. Manning indicated that as a result of NANC discussions, two Action Items were provided. He stated that the NANC directed the Industry Numbering Committee (INC) to conduct a technical analysis of Multiple LRNs for multiple tandems, and provide alternatives to NANPA. NANPA was asked to review these technical alternatives and determine their number exhaust impacts. He advised that as part of this process, NANPA was to convene a conference call of interested NANC members to discuss the assumptions that were going to be used in NANPA's NPA exhaust analysis.

Mr. Manning reported that the INC agreed that due to the unique network circumstances of individual service providers and the difficulty for NANPA recognize what network arrangements may result in multiple LRN assignments, a survey of service providers was the best way to attempt to identify the potential impact of multiple LRN assignments to a single switch/POI on CO Code demand. Mr. Manning advised that as an alternative, the INC agreed that a survey of service providers would be helpful in determining the magnitude of this issue.

Mr. Manning reported that on September 1, 2003, the leadership of the INC, the LNPA WG, NANPA, and the Pooling Administrator developed a survey to gauge the potential impact of assigning multiple LRNs on CO Code assignments. He advised that Service Provider responses are due to NANPA by September 26, 2003.

Mr. Manning advised that as of September 22, 2003, NANPA had received over 175 survey responses. He reported that the vast majority of the responses (over 150) have indicated that no additional codes are needed for Multiple LRN purposes. Mr. Manning further reported that the for providers indicating that additional codes are necessary for Multiple LRNs, approximately 108 CO Codes over 40 NPAs were needed. He stated that excluding two surveys where NANPA suspects that the respondents may have misunderstood the survey, the quantity of additional codes is reduced to about 70. Mr. Manning further stated that excluding the NPAs identified in these two surveys, the maximum number of additional codes needed for LRN purposes to serve multiple tandems in a single area code was four codes. Mr. Manning advised that he is continuing to receive survey responses.

Chairman Atkinson advised that the purpose of the survey was to find out whether this issue is a major problem. He suggested that it is not a major problem, and requested feedback. Mr. Manning stated that the majority of the Service Providers that were asking questions had a pretty good understanding of what NANPA was asking for, but they needed clarification or some confirmation on whether or not their situation warranted the additional CO Codes. He further stated that there may be some Service Providers that may have needs for additional CO Codes but for their own internal reasons have decided not to respond to the survey. Mr. Manning noted that very few wireless Service Providers have responded. He stated that there is an issue of how individual companies are interpreting the survey and what their viewpoint is in responding to it.

Ms. Kelly commented that when she participated in the INC conference call, it disturbed her to find out that some wireless companies indicated they chose to assign a new Common Language Location Identification (CLLI) to an existing switch to evade the LRN limitation. She further commented that as far as the survey, it was a wonderful attempt to get data in order to find out whether it is a major problem. Ms. Kelly stated that if it is truly only 70 codes, it has less concern, but there is no disadvantage to a Service Provider not returning the survey or, through disingenuous or just pure mistake, not accurately forecasting their needs. She further stated that if it is truly only 70 codes, she would argue that the safety value mechanism can accommodate the need for multiple LRNs. Ms. Kelly advised that a Service Provider can go to its state commission if they have delegated authority or to the FCC if they need Multiple LRNs within the LATA. She recommended that the NANC not make any policy decision that Service Providers should be entitled to Multiple LRNs in a multi-tandem LATA at this time.

Mr. Welch remarked that he shared the concern that some Service Providers may not be responding. He noted that he sent correspondence to NANPA suggesting that from SBC's perspective, it finds itself in a unique position of Service Providers not wanting to

get a second LRN. Mr. Welch advised that he is in a situation of either not processing calls because he is not sure whether it terminates within the waiver area or trying to figure out a way to technically make it work, not knowing whether or not the calls that are actually terminating where they are supposed to be terminating. He expressed concern that if the INC does not put something in the Guidelines, he might not be compliant with other regulations. Mr. Welch stated that, otherwise, SBC would need authority to not process certain calls.

Chairman Atkinson indicated that there are two proposals: 1) a proposal from the New York PSC that the NANC not do anything, and 2) a proposal from SBC that the NANC needs to do something.

Mr. Bench advised that the INC's purview is numbering issues and to give direction to the Pooling Administrator or the NANPA. He noted that this is a problem in certain areas and not all areas. Mr. Bench stated that the inter-tandem trunking arrangement is an interconnection/interoperability issue and not under the purview of the INC. He advised that the standard by which local number portability is put together, gives options for multiple LRNs. Mr. Bench stated that the INC has identified three scenarios in which a multiple LRN would be a solution to a carrier's problem. He further stated that the INC fulfilled its obligation to the NANC by identifying three technical numbering issues in which the NANC feels that a second multiple LRN may be assigned to a carrier. Mr. Bench pointed out that the INC's responsibility is to make sure that the call completes. He advised that if the second multiple LRN is the solution that allows calls to complete, then that is the solution, right now. Mr. Bench stated that the NANPA and the Pooling Administrator need universal guidelines. Mr. Bench stated that the INC did a marvelous job.

After extensive discussion, it was decided that the INC will not bring the issue to final closure. Four Action Items were assigned to this issue: 1) SBC will make a technical presentation at the November 5, 2003 NANC meeting illustrating the cross-LATA boundaries issue related to multiple LRNs; 2) the INC will send a list of LRN assignment practices to the NANC; 3) the NANPA will send the final LRN survey results to the NANC members; and 4) MCI will circulate appropriate excerpts regarding LRNs from the FCC's 3rd Report and Order as soon as possible. Jean-Paul Emard, ATIS, stated that he will provide the NANC with a link to the issue that has a resolution statement, as well as a link to the documents that are under question. He further stated that he will also provide the practices document, and the issue resolution statement.

H. Local Number Portability Report (LNPA). Mr. Sacra reported that the Architecture Planning (AP) Team is an ad hoc subgroup of the LNPA WG. He advised that the AP Team is responsible for assessing Number Portability industry production technical issues within the purview of the LNPA Working Group and developing recommendations for the strategic direction of number Portability architecture. Mr. Sacra reported that the AP Team continued the development of a wireline/wireless porting and pooling traffic model for use in database capacity sizing and interface throughput projections. He further reported that the AP Team is developing a Service Order

Activation (SOA) traffic model for notifications. Mr. Sacra reported that NeuStar will be loading a Number Portability Administration Center (NPAC) Point Release, an interim Release between two major Releases, in the Mid-Atlantic Region on October 26, 2003 and in the remaining six U.S. Regions on November 2, 2003. He noted that this NPAC Point Release is going to significantly improve NPAC database processing in preparation for Wireless Number Portability. The AP Team will continue to meet on Tuesday afternoon during LNPA week.

Mr. Sacra reviewed the Problem Identification and Management (PIM) report with the Council.

Mr. Sacra reported on the Revised NANC LNP Provisioning Flows. He stated that Chairman Atkinson requested that this item be placed on the Agenda, based on a letter that Chairman Atkinson received from the CTIA expressing concerns with a change that was made to the LNP Provisioning Flows regarding the wireline to wireless porting interval. Chairman Atkinson questioned whether this is still an issue with CTIA.

Mr. Sacra explained that the initial charge of the LNPA WG was to revise the official NANC Flows that were adopted and approved by the FCC in April 1997. He stated that those Flows did not address porting between resellers, porting of Type 1 cellular numbers, and wireless porting. Mr. Sacra indicated that the initial revision effort was to address PIM 1 (wireline reseller flows) and PIM 18 (wireless reseller flows). The LNPA and WNPO determined that a word-for-word review was necessary. Every revision was highlighted and discussed at each monthly LNPA and WNPO meeting. Both wireline and wireless Service Providers participated in the process. Mr. Sacra stated that during the WNPO and LNPA WG meeting in January 2003, a change was made to the text for the wireline to wireless porting interval, from “to be determined” to “the wireline interval would be used”. He indicated that concern was raised regarding the change. Mr. Sacra stated that the LNPA WG and the WNPO felt that it was appropriate to make that change. He pointed out that the change made the NANC Flows consistent with NPAC functionality implemented in 1999. Mr. Sacra further pointed out that the change is also consistent with the LNPA recommendation in the 3rd Report on Wireless/Wireline Integration.

Mr. Sacra advised that the Flows were finalized at the WNPO and LNPA WG meeting in June 2003. Both wireline and wireless Service Providers were given one month to review the Flows before they would be submitted to the NANC in July 2003. The Flows were transmitted to the NANC via cover letter in July 2003. On September 8, 2003, the CTIA sent a letter to Chairman Atkinson raising a concern that the text had been changed.

Mr. Sacra advised that the LNPA WG wants to make sure that the record is accurate regarding the statements that are in the CTIA’s letter. He stated that on behalf of the LNPA WG, he wants to assure the NANC that there is absolutely no effort on the part of the LNPA WG or the WNPO to hide or bury any of the changes in the document. Mr. Sacra emphasized that the wireline/wireless porting change was made in both the open

sessions of the LNPA WG as well as the WNPO. He advised that the change was made to reflect the operations that would be in place on November 24, 2003. Mr. Sacra further advised that wireless and wireline providers stated that they needed to know what was going to be in place and have it reflected in the Flows in order to be able to design their internal processes. He stated that the understanding was that any of the Flows are subject to change if further FCC guidance dictates it. Mr. Sacra noted that all participating Service Providers reviewed the Flows. He indicated that there was no controversy raised regarding the change during any of the meetings.

Sue Tiffany, Co-Chair, WNPO, stated that Lori Messing, CTIA, was invited to join in the WNPO meeting while the letter was being discussed. Ms. Tiffany advised that from that discussion, the WNPO came up with the following recommendation:

It is the recommendation of the WNPO that a footnote be added to the NANC Flows indicating these are the Flows the industry will use on November 24, 2003. These Flows are subject to change pending guidance from the FCC regarding Intermodal Porting intervals.

Ms. Tiffany stated that the recommendation was discussed in the LNPA WG meeting, and there was some concern about opening the NANC Flows to put the footnote in, and setting a precedent for additional changes. She advised that in the LNPA WG meeting, the WNPO agreed that the recommendation could be addressed in the cover letter instead of a footnote, and that the letter should be forwarded to the FCC. Ms. Tiffany stated that Intermodal Porting is just one of the currently unresolved issues that could affect the NANC Flows. Mr. Sacra stated that the feeling of the LNPA WG was that it was better to utilize a cover letter as opposed to a footnote.

Ms. Messing stated that she received a good education from participating in the conference call. She stated that CTIA can now appreciate why the change was made in the Flows. Ms. Messing explained that CTIA raised the issue because during service level agreement negotiations, where carriers negotiate between each other in preparation for number portability, the updated Flows were used as leverage by wireline carriers, who would not agree to a porting interval shorter than 4 days. Ms. Messing indicated that the Flows, in their updated form, were being used as an FCC signed-upon agreement rather than something that is still an unresolved issue. She advised that CTIA supports the letter noting the change going to the FCC, and also supports the original WNPO suggestion to add a footnote to the Flows. Ms. Messing stated that the CTIA feels that the LNPA WG Flows should reflect the current status. She remarked that the porting interval has become a huge source of contention and is not resolved.

After extensive discussion, it was decided that Chairman Atkinson will add the footnote to the NANC Flows and prepare a cover letter identical to what the NANC currently has, except for the footnote, and send it to the Chief of the Wireline Competition Bureau. The letter will state that the NANC has added a footnote. It will also reference all of the previous correspondence. Chairman Atkinson stated that Mr. Sacra and Ms. Messing

should mutually agree where the footnote should go. He further stated that he will then circulate the letter to the NANC members for review.

Ms. Mulberry opposed adding the footnote. Mr. LaGuttuta agreed with Ms. Mulberry. Chairman Atkinson stated that the NANC operates on consensus, not unanimity. He further stated that Ms. Mulberry's point is very well taken and that he might be able to work it into the cover letter.

Wireless Number Portability Operations (WNPO) Report to the NANC. Sue Tiffany, Co-Chair, presented the report to the Council. Ms. Tiffany reported Susan Sill, Chair, WTSC, has agreed to notify the WNPO when documents have been posted to the NPAC web site. A testing "Lessons Learned" matrix will be posted once a month to the NPAC web site. WTSC has also proposed creating a Job Aid for new test entrants that would include minimum test requirements and tips to efficiently set up a test. WTSC notes that carriers have proclaimed a Testing Quiet Period from November 15, 2003 through January 15, 2004. The WTSC and WNPO agreed that the WTSC would continue as a subcommittee through June 2004. The continued existence of WTSC will be reevaluated at the May or June 2004 WNPO and WTSC meetings.

Ms. Tiffany gave an update from the OBF. She reported that the NIIF proposed JIP (Jurisdiction information Parameter) update to the NIIF Reference Document was discussed.

Ms. Tiffany also reported on NPAC Conflict Timers. Ms. Tiffany stated that in the current wireless configuration, a 24-hour conflict timer is set to automatically return to a 6-hour conflict timer on November 24, 2003. The majority of the carriers felt the timer should stay at 24 hours for some period of time, while others preferred the previously agreed to plan to revert to a 6-hour timer. Consensus could not be reached, and the conflict timer will revert to 6 hours on November 24, 2003.

Ms. Tiffany reported that there was discussion on the Service Provider Extended Maintenance Window. She stated that consensus was reached to reduce the Extended Maintenance Window from the current 11 hours to 8 hours. NeuStar stated that 8 hours should be sufficient. The change will be effective on November 2, 2003. The regular Service Provider Maintenance Window, conducted on the other Sundays of the month, will remain unchanged.

Ms. Tiffany reported that the WNPO worked with the NENA Public Education Committee to come up with the consumer education package for 911 service and porting intervals. WNPO agreed that the NENA should send the 911 consumer education recommendation, along with a cover letter, to the industry to obtain the widest possible distribution of the material.

Ms. Tiffany advised that the WNPO accepted two new issues: "fallout reduction" and erroneous Subscription Version (SV) cancellation. The WNPO created a "Fallout

Reduction” Subcommittee. The subcommittee will be looking at fallout from an industry perspective and trying to find ways to reduce and minimize fallout.

The SV issue arises when the old service provider cancels a SV in error. The original contribution addressed wireline and wireless cancel pending tunables, requesting that the tunables be reduced from 9 hours to 2 hours. The WNPO requested that a separate contribution be submitted to the WNPO addressing the wireless tunables only.

I. North American Numbering Plan Administrator (NANPA) Report to the NANC. John Manning, NANPA, provided the report to the Council.

Central Office Code (CO) Activity Report. Mr. Manning reported that the total assignments to date in 2003 are 2,482 codes, and the net assignments are 1,139 codes. Mr. Manning stated that this compares with 5,554 assignments and 2,555 net assignments for the first eight months of 2002. He noted that if the 2003 figures were annualized, they would be approximately 3,700 codes for assignments, and approximately 1,700 codes for net assignments.

NPA Relief Planning Report. Mr. Manning stated that the Relief Planning report has been modified to reflect only those NPAs that are projected to exhaust within 36 months. He reported that there are four NPAs currently projected to exhaust within the next 12 months – 310 (California), 909 (California), 815 (Illinois), and 601 (Mississippi). Mr. Manning indicated that the NANPA will monitor the 815 and 601 NPAs in anticipation that it may modify the projected exhaust date. Mr. Manning reviewed the changes to the June 2003 NPA exhaust projections with the Council.

Mr. Manning reported that with concurrence of the TRA of Tennessee, the NANPA facilitated a meeting on September 9, 2003, and the industry reached consensus to withdraw the 615 NPA relief petition. The Pennsylvania PUC entered an order on August 1, 2003 to dismiss the 570 NPA relief petition. The Pennsylvania PUC dismissed the 717 NPA relief petition in the same order. The PUC also rescinded the previously adopted implementation schedule for the 445 NPA overlay. It directed the NANPA to reclaim the NPA and place it in “reserved” status until circumstances warrant its assignment in relief of the 215/267 area codes. Mr. Manning stated that with the concurrence of the New Jersey BPU, the NANPA will facilitate a meeting on September 29, 2003 to discuss withdrawal of the 609, 856, and 908 NPA relief petitions.

Mr. Manning reported that at the July 2003 NANC meeting, the NANPA was assigned an action item to post to the NANPA web site by August 29, 2003, a list of grandfathered wireless central office codes. He advised that the NANPA completed this action and has posted a list of grandfathered codes to the NANPA web site. Prior to posting this list, the NANPA circulated a list of potentially grandfathered NPA-NXX codes with the involved service providers for their review and input. Based upon information received from these service providers, the list was updated accordingly.

Other Number Administration Issues. Mr. Manning reported that the NANPA will conduct an NRUF review session with interested state commissions on September 29, 2003. The purpose of this session is to review the reports that states receive from the NANPA each NRUF reporting cycle.

Mr. Manning stated that in 2000, based upon direction provided by the NANC Chair, the NANPA established a fund for offsetting the expenses incurred by NARUC representatives attending NANC meetings. He indicated that this fund was originally created by the first NANC Chair. Mr. Manning advised that in 2000, the Chair requested that the NANPA assume the responsibility of managing the fund. He stated that NANC members would periodically contribute to the fund. Mr. Manning stated that over the past few years, the fund has not been used since state NANC representatives have been paying their own expenses to attend NANC meetings. He noted that as of August 19, 2003, the fund balance is \$4,639.63. Mr. Manning requested direction from the NANC on what to do with the funds.

Ms. Lynch urged the NANPA not to eliminate the fund. She advised that all of the states will be sending a coordinated request through NARUC to the FCC regarding the fund. Chairman Atkinson advised that, if the states are going to do that, it should be done sooner rather than later.

4Q02 and 1Q03 NeuStar Neutrality Reports. Mr. Manning provided copies of the 4Q02 and 1Q03 NeuStar Neutrality Audit reports to the Council.

J. Number Oversight Working Group (NOWG) Report. Ms. Mulberry provided the report to the Council.

PA Change Order #24 Recommendation. Ms. Mulberry reported that Change Order #24 was submitted on August 26, 2003. She explained that this Change Order is associated with modifications to procedures for Code Holder/LENG assignee exit and service disruptions with PA block assignments that contain unknown contamination. Ms. Mulberry stated that the NOWG worked with the PA to identify a modified solution, and recommends that the following alternative be accepted: The PA selects one NPA from each NPAC region and performs an audit of embedded block inventory. The results will assist the PA in determining whether to proceed with a one time scrub of all the NPA's in PAS.

NOWG PA Performance Review – Proposal Overview. Ms. Mulberry stated that at the July 15, 2003 NANC meeting, the NOWG was asked to prepare a proposal about conducting an annual performance review for the PA. She advised that the survey and corresponding NOWG report will focus on whether the tasks performed by the PA are in accordance with regulatory requirements, numbering resource assignment procedures, and industry guidelines. Ms. Mulberry listed the steps that the NOWG would take in doing an annual performance review for the PA. She noted that these steps were presented to the NANC previously. Ms. Mulberry shared with the NANC a proposed PA and NANPA Performance Review Timeline. She stated that in order to accommodate the

workload of trying to do two performance evaluations in a given period, the NOWG proposes to provide a PA Evaluation Report at the March NANC meeting, and a NANPA Evaluation Report at the May NANC meeting. Ms. Mulberry reviewed the PA Annual Performance Survey Contents with the Council.

NANPA Performance Metrics – July & August 2003. Ms. Mulberry advised that the NOWG has a standing agenda and meets with the NANPA on a monthly basis to review the NANPA's internal performance metrics and to discuss the status of various activities. She reviewed the status of the following activities with the Council: CO Code Administration – July – one code assignment in error/rejection; NRUF – 100% compliance (busy season); NPA Relief Planning – 100% compliance; Other NANP Resources – July – one Carrier Identification Code (CIC) not processed within 10 days.

Status of NANPA 2003 Process Improvement Plan (PIP). Ms. Mulberry reviewed with the Council, the status of the Recommendations for Improvement from the 2003 NANPA Performance Review and Evaluation Process Improvement Plan. She advised that the NANPA has been working very diligently to resolve the CAS/LERG/NRUF reporting discrepancies.

Ms. Mulberry reviewed the 2003 NOWG Meeting Schedule with the Council.

Ms. Putnam questioned whether the dates on the Timeline for the PA Performance Review and the steps leading up to the PA survey are sample dates or proposed dates. Ms. Mulberry stated that the NOWG has proposed what the Timeline might look like. She further stated that the NOWG has not been instructed by the FCC to begin a PA evaluation. Chairman Atkinson inquired as to when the NOWG will receive direction from the FCC. Mr. Williams stated that he has been informed by the Office of Managing Director that it is currently finishing up the fiscal year and that the NOWG should receive direction shortly after September 30, 2003. He indicated that another holdup in the process is that there has been some talk between the FCC and NeuStar regarding how to perform a PA evaluation. Ms. Putnam stated that since the PA has been advised by the FCC that participation in this process would require a contract modification, and the PA does not know the extent of the contract modification, it puts the PA in a very awkward position to have a request to participate in the NOWG's preparation before it is authorized to do so.

Ms. Mulberry gave notice that the NOWG will be submitting a draft NANPA Survey for review at the November 5, 2003 NANC meeting.

K. Impact on Increasing the Contamination Threshold in Area Codes 310 and 909. Chairman Atkinson advised that the FCC released an Order on August 11, 2003 on the Petition of the California Public Utilities Commission for Waiver of the Federal Communications Commission's Contamination Threshold Rule. He noted that in the Order, the FCC requests that the California PUC file a report evaluating the effectiveness of the waiver. Chairman Atkinson further noted that the Order also requests the NANC to evaluate the extent to which increasing the Contamination Threshold made additional

numbering resources available in the 310 and 909 area codes. The NANC Report should be submitted to the Wireline Competition Bureau by April 30, 2004. Ms. Lynch made a request, on behalf of NASUCA, that they have a representative on the Working Group preparing the report. Chairman Atkinson asked for volunteers to serve on the IMG to prepare the report. He indicated that the report needs to be completed by the March 16, 2004 NANC meeting. Volunteers include: Iowa, New York, CTIA, AT&T, Sprint, MCI, Verizon, SBC, Nextel, NCTA, AT&T, T-Mobile, and NASUCA. Mark Welch volunteered to serve as the Chair.

L. Status of ENUM Implementation in the U.S. Gary Richenaker, Telcordia, presented the report to the Council. Chairman Atkinson stated that some months ago, the NANC agreed to periodically be kept informed about ENUM. Mr. Richenaker provided a status update on the ENUM Forum. He stated that the ENUM Forum has received support from government agencies, including NTIA, the FCC, and the Department of State. Mr. Richenaker advised that in February 2003, the NTIA provided the ENUM Forum with guiding principles. He reviewed with the Council the ENUM Forum Specifications Document, the NTIA Principles, the ENUM Forum Current Work Plan and Status, and the Next Steps.

Mr. Richenaker stated that he received a letter from Nancy Victory, NTIA, Chairman Powell, FCC, and David Gross, Dept. of State, supporting continued industry involvement in ENUM. He advised that the ENUM Forum will work with these government agencies. Mr. Richenaker added that the industry must continue to work on an implementation plan, and the ENUM Forum must continue to work on technical issues.

Chairman Atkinson stated that the NANC will keep ENUM status updates on a six-month cycle.

M. List of NANC Accomplishments. The Council reviewed the List of NANC Accomplishments. Chairman Atkinson asked the Council to provide any changes/updates to the list.

N. Public Participation. Douglas Freberg II, lead lobbyist on pipeline safety issues for the American Gas Association (AGA) stated that the 3-Digit DIG issue was initiated by a New Jersey Congressman following an accident in New Jersey in 1994. Mr. Freberg commented that the pipeline safety industry is willing to meet with the NANC members to discuss the implementation of the Pipeline Safety Act.

Chairman Atkinson advised that this is Nancy Brockway's last NANC meeting. He stated that her good humor and strongly held views have been very helpful to the NANC. Chairman Atkinson expressed his appreciation for Ms. Brockway's involvement with the NANC over the years.

Next Meeting: November 5, 2003

Action Assignments: September 25, 2003 NANC Meeting

1. **DIG IMG:**
Continue Evaluating 3-digit options, including: a) sharing 211, 311, 511 or other N11's; b) impact of using 344 on number exhaust; c) E911 coordination (i.e., how would calls be transferred between 811 and 911 call centers?); d) any other issues.
2. **NARUC:**
Bring DIG issue to States' attention and attempt to obtain a NARUC consensus on the issue.
3. **WNPO/CTIA:**
Develop as quickly as possible a mutually acceptable footnote for the LNP Porting Flows document; provide Chair with document to forward to FCC
4. **CHAIR:**
Draft letter to FCC to transmit footnoted LNP Porting Flows, circulate to NANC before sending to FCC.
5. **INC:**
At next NANC meeting, summarize VoIP Workshop and matrix.
6. **OUR:**
Determine impact of April 1, 2004 reclamation of "paid toll free" numbers on Caribbean countries.
7. **SBC:**
Make a technical presentation at Nov. meeting illustrating the cross-LATA boundaries issue related to multiple LRNs.
8. **INC:**
Send LRN assignment practices to NANC.
9. **NANPA:**
Send final LRN survey results to NANC members as soon as it is completed.
10. **MCI:**
Circulate appropriate excerpts regarding LRN from FCC's 3rd Report & Order as soon as possible.
11. **Contamination Threshold IMG:**
By the March NANC Meeting, prepare a report for NANC to send to the FCC re: Impact on Increasing the Contamination Threshold in Area Codes 310 and 909.